

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants,

Civil Action No. 04-CV-10294 DPW

MICHELLE TREBITSCH, On Behalf Of  
Herself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10307 DPW

INFORMATION DYNAMICS, LLC, On  
Behalf of Itself and All Others Similarly  
Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R.  
JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M.  
AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10308 DPW

**[Additional Captions Follow on Next Page]**

**DECLARATION OF JAMES N. BROWER IN FURTHER  
SUPPORT OF HIS MOTION FOR APPOINTMENT AS  
LEAD PLAINTIFF AND APPROVAL OF CHOICE OF LEAD COUNSEL**

PETER KALTMAN, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RUBEN  
GRUBER, HASSAN AHMED and  
STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10309 DPW

SAMANTHA DEN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10310 DPW

RICHARD CURTIS, Individually And on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10314 MLW

**[Additional Captions Follow on Next Page]**

RONALD KASSOVER, on Behalf of the  
Ronald Kassover IRA and All Others  
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10329 DPW

STEVE L. BAKER, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10333 DPW

MICHAEL KAFFEE, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10345 DPW

**[Additional Captions Follow on Next Page]**

HAIMING HU, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-10346 DPW

CHARLES STARBUCK, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10362 DPW

SAMUEL HO, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10363 DPW

**[Additional Captions Follow on Next Page]**

JEFFREY C. RODRIGUES, Individually  
and On Behalf of All Others Similarly  
Situating,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10364 DPW

ROBERT CONTE and MARK RESPLER,  
Themselves and On Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10382 DPW

WHEATON ELECTRICAL SERVICES  
RETIREMENT 401K PROFIT SHARING  
PLAN, On Behalf of Itself and All Others  
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10383 DPW

**[Additional Captions Follow on Next Page]**

BRIAN CLARK, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R.  
JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M.  
AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10454 DPW

SHEILA BROWNELL, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV- 10597 DPW

SAVERIO PUGLIESE, On Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10612 DPW

**[Additional Captions Follow on Next Page]**

DAVID V. NOCITO, On Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10623 DPW

I, James N. Brower, respectfully submit this Declaration in further support of my motion for appointment as Lead Plaintiff and approval of my selection of Lead Counsel, Berman DeValerio Pease Tabacco Burt & Pucillo (“Berman DeValerio”), in this securities class action. Under the pains and penalties of perjury, I hereby declare and state the following:

1. As evidenced by my Certification filed as Exhibit B to the Matraia Declaration submitted in support of my motion for appointment as lead plaintiff, I purchased Sonus Networks, Inc. (“Sonus” or the “Company”) securities during the Class Period and suffered substantial losses as a result. I solely made the investment decision to purchase the Sonus shares, basing my decision upon, among other things, a review of the publicly-available financial statements issued by Sonus and other public representations made by the Company. In light of my substantial loss, I am motivated to pursue this action on behalf of myself and the other members of the Class.

2. I have reviewed the papers filed by Berman DeValerio in connection with the Lead Plaintiff process. I am aware of the arguments made by other movants in support of their lead plaintiff motions. I understand that certain movants have questioned



whether I have the ability to carry out the duties of a Lead Plaintiff. I believe that, based on the following information, I do have the skills and experience to act as a Lead Plaintiff.

3. I have an Associate Degree in electrical engineering from Massasoit Community College and I am currently working toward an Associate Degree in computer programming from Massasoit. I have worked in the telecommunications industry for approximately twenty years. I am currently employed by Aspect Communications, where I am a customer service technician specializing in the installation and maintenance of telecommunications systems for large corporations. I am a resident of West Bridgewater, Massachusetts.

4. I am responsible for managing my financial affairs, including making all decisions concerning my investments in securities. I have been investing in securities for approximately twenty years. I closely monitor my investments, examining their progress on a daily basis. I have been monitoring Sonus' performance since the Company went public.

5. I understand the responsibilities I would undertake as Lead Plaintiff. I am willing to and fully intend to fulfill those responsibilities for the benefit of all Class members, including, if necessary, making myself available for deposition and trial. I will provide fair and adequate representation and continue to work with attorneys from Berman DeValerio in an effort to obtain the largest possible recovery for the Class in this litigation.

6. I understand that I have the right to select counsel as part of the lead plaintiff process. I selected, and made a considered judgment in selecting as Lead

Counsel, Berman DeValerio, which is experienced and qualified to represent me and the Class in this action. I have based this decision on discussions with attorneys from Berman DeValerio and a review of the firm's experience and past results.

7. I have conferred with my attorneys at Berman DeValerio concerning the prosecution of this litigation and will continue to do so throughout the case. We have discussed procedures to provide for efficient prosecution of this action, including regular telephone calls or meetings to discuss and evaluate the case as it progresses and my receipt and review of important pleadings and other documents in this action. We have also discussed the issue of attorneys' fees and I understand that the award of such fees, if any, must be approved by the Court and any fee application submitted to this Court by my counsel will be reviewed and carefully considered by me before it is submitted. I believe that I will be able to make sound decisions with my counsel about the prosecution of this litigation.

8. The matters stated herein are true of my own personal knowledge and, if called to testify thereto, I could and would competently do so.

Signed under the pains and penalties of perjury this 7<sup>th</sup> day of May, 2004.

/s/James N. Brower  
James N. Brower

Sonus/p/LP\_BrowerDecl